

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JEANNE RHOADES,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 4:17-cv-02486
	)	
BJC HEALTH SYSTEM, et al.,	)	
	)	
Defendants.	)	

**AFFIDAVIT OF CAITLIN O'BRIEN IN SUPPORT
OF DEFENDANTS' MOTION TO DISMISS**

I, Caitlin O'Brien, having been duly sworn on my oath, hereby declare and state as follows:

1. I am employed by Defendant BJC Health System. I am authorized to make this affidavit on behalf of Defendants BJC Health System and the other named Defendants, which are affiliate organizations of BJC Health System. I am over the age of eighteen and am competent to testify regarding the matters described herein.

2. I have worked for Defendant BJC Health System since December 15, 2013. My current job title is Project Manager. In the regular course of my job duties, I am familiar with business records relating to Defendants' personnel policies. Before I began working for Defendant BJC Health System, I was employed by Defendant Barnes Jewish Hospital from March 29, 2010 until December 14, 2013.

3. I have reviewed the documents attached to Plaintiff's Complaint as Exhibits A, B, C, and D. Exhibits A, B, C, and D to Plaintiff's Complaint are true and correct copies of some personnel policies pertaining to certain employees of Defendants at different periods of time.

4. Exhibits A, B, C, and D to Plaintiff's Complaint only reflect some of the policies that are part of a much larger collection of policies applicable to various employees of Defendants.

Attached to this affidavit as BJC-1 is a true and correct copy of the Table of Contents for personnel policies issued by Defendants. This table references the policies attached as Exhibits A, B, C, and D to Plaintiff's Complaint.

5. Attached to this affidavit as Exhibit BJC-2 is a true and correct copy of another current personnel policy issued by Defendants. This policy is part of the same set of personnel policies that contains Exhibits A, B, C, and D attached to Plaintiff's Complaint.

I have read this Affidavit of 5 paragraphs and 3 pages (including this page), and am competent to testify to the matter stated herein, and swear that it is true and correct.

Caitlin O'Brien

Caitlin O'Brien

STATE OF Missouri)

COUNTY OF St. Louis)

SS

Subscribed and sworn to before me this 28th day of September, 2017.

Sarah L. Keller

Notary Public

My Commission Expires:



SARAH L. KELLER
My Commission Expires
April 11, 2020
St. Louis County
Commission #12326494

31271984.1

31369513.1

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Policy Title: Policy on Policies	Original Effective Date: September 1, 2009
Policy Number: 2.01	Last Review Date: June 1, 2015
Excluding: None	Last Revision: June 1, 2015
Approved By: Human Resources Executive Council	Next Review Date: June 2018

Policy Purpose

To maintain a clear and consistent process and controls for the creation, review, revision or elimination of BJC HealthCare's human resources (HR) policies. This policy will further help to ensure that all HR policies adopted are legally compliant, have administrative integrity and support BJC's vision as well as proactive employee relations philosophy. This policy supersedes any and all prior policies regarding the creation, revision, approval or deletion of BJC HR policies.

Summary

1. BJC HR policies establish behavioral guidelines for employees and provide information regarding compensation, benefits and other terms and conditions of employment. Policies have broad application and help to ensure compliance with applicable laws and regulations, meet organizational goals, promote operational efficiencies, and ensure the equitable and fair treatment of our employees. When necessary, policies will also contain procedural guidelines for carrying out the policy. BJC HR policies do not constitute a contract of employment and may be changed at any time at BJC's sole discretion.
2. The Human Resources Executive Council (HREC), which includes BJC's Senior Vice President and Chief Human Resources Officer (SVP/CHRO), has responsibility for the creation, review, revision, elimination and approval of BJC's human resources policies.
3. It is the responsibility of all members of management and those with supervisory roles to abide by and support BJC policy. Moreover, all employees have responsibility to report violations of policy to their manager, their human resources representative, or the BJC compliance department.